

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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TESTIMONY OF  
JEAN-PAUL LA MARCHE  
IN CONNECTION WITH  
PETITION 1347

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JANUARY 23, 2020

1   **Q.     Please state your name, occupation and business address?**

2   A.     My name is Jean-Paul La Marche. I am the Project Development Director of Greenskies  
3           Clean Energy LLC, (“Greenskies”) the parent company of the Petitioner, and I am  
4           providing testimony on behalf of the Petitioner’s Motion to Reopen the Petition in this  
5           proceeding. My business address is 180 Johnston Street, Middletown, Connecticut.

6   **Q.     What are your responsibilities at Clean Focus?**

7   A.     I am responsible for the direction of all project development and engineering for various  
8           Greenskies projects and the projects of the affiliates of Greenskies, such as the Petitioner.

9   **Q.     What is the purpose of your testimony?**

10  A.     The purpose of my testimony is to discuss the changes made to the Waterford Project that  
11           is the subject of Petition 1347, specifically, the changes that have been made to the  
12           Project’s design since the Siting Council issued its original decision in this Petition on  
13           October 25, 2018.

14  **Q.     Why did you make changes to the Project’s design?**

15  A.     The Project team understood that there was significant feedback that was received from  
16           the Siting Council, the Connecticut Department of Energy and Environmental Protection  
17           (“CT DEEP”), the Town of Waterford, and Save the Rivers/Save the Hills during the first  
18           Siting Council Petition involving the Project. Indeed, the Project team has had  
19           conversations with the Town of Waterford, CT DEEP and Save the Rivers/Save the Hills  
20           since the Siting Council issued its decision in October of 2018, and all of these  
21           conversations have led the Project to revise its designs.

1    **Q.     Briefly describe the changes that were made to the Project.**

2    A.     There were several substantive changes made to the Project's design as a result of the  
3           incorporation of this feedback. First, the Project hired a new third party environmental  
4           and engineering consultant, VHB. The new consultant conducted additional onsite  
5           wildlife studies to confirm that the Project would have no negative impact to surrounding  
6           wildlife. VHB also met with CT DEEP's stormwater staff on several occasions and  
7           modified the design of the Project to comply with CT DEEP's new, stricter guidelines for  
8           stormwater runoff from solar PV facilities. VHB also performed a number of additional  
9           sub-surface investigations to confirm the Project's modified storm water design is  
10          correct. As a result of all this work, the Project scaled back the size of the system and the  
11          overall footprint of the Project.

12   **Q.     What testing was done since 2018 on the Project Site, and why was that testing**  
13          **performed?**

14   A.     Approximately 100 test pit investigation holes were excavated and inspected across the  
15          Site since 2018 to aid in the design of stormwater management features. Infiltration  
16          testing was performed in the locations of proposed infiltration basins, and these  
17          infiltration rates were then incorporated into the hydrologic modelling for the Project  
18          Site, as required by CT DEEP practices.

19   **Q.     What other changes were made to the stormwater design since 2018?**

20   A.     As the Siting Council is aware, the CT DEEP has been developing guidance on  
21          stormwater discharges from solar facilities. This guidance is sometimes referred to as  
22          "Appendix I." The Project's stormwater design was altered over the past six months in

1 order to bring it into compliance not only with applicable state regulation, but also the  
2 guidance found in Appendix I. For example, the Project now incorporates the loss of a  
3 Hydrologic Soil Group class in its design as a conservative measure for sizing the  
4 Project's stormwater basins. Channel protection is also provided at each stormwater  
5 basin in accordance with the 2004 Connecticut Stormwater Quality Manual by mitigating  
6 2-year proposed peak flows to 50% of the pre-condition rates.

7  
8 Perhaps even more importantly, a new detailed construction sequence and phasing plan  
9 has been recently been designed for the Project. The Project team has met with CTDEEP  
10 Stormwater staff on several occasions to discuss the Project and in an effort to  
11 incorporate requested modifications. Most recently, on December 17, 2019,  
12 representatives of the Project met with CT DEEP Stormwater Permitting/Enforcement  
13 personnel. At that meeting, the Project team suggested that it would be willing to clear  
14 the Project Site during the spring/summer of 2020 (assuming regulatory approvals are  
15 obtained), and then hydroseed the site before beginning construction. The construction  
16 would begin in 2021 after the Site had achieved some level of stabilization.

17 **Q. Has the size of the Project changed since 2018?**

18 A. The Project has been scaled back in both terms of the number of panels and in terms of  
19 acreage. This will result in a mitigation of potential stormwater impacts, as well as  
20 benefits to the surrounding habitat. By proceeding in this fashion, limits of clearing were  
21 reduced from 98 acres to 75 acres and a 100-foot wetland non-disturbance buffer has  
22 been applied to the Project. The changes can be seen more clearly in the drawing on page  
23 4 of this testimony.







1    **Q.    Was additional Natural Diversity Database (NDDB) work done on the Project? If**  
2        **so, what were the results and the Project's response to those results?**

3    A.    The Project undertook additional wildlife/NDDB work as a direct result of the comments  
4        the Project received in the August 24, 2018 letter that the CT DEEP filed in the instant  
5        Petition. In response to those comments, an NDDB Determination Request was prepared  
6        and submitted to NDDB staff for which a Preliminary Assessment was provided in  
7        response. Each species listed on the assessment was surveyed for at the Site, and the  
8        findings and any associated proposed conservation measures are included in a  
9        comprehensive wildlife report which was re-submitted to NDDB for its review. The  
10       report can also be found in Appendix I of the re-submitted Petition.

11   **Q.    Were any other changes made to the Project?**

12   A.    Yes. The original Petition contemplated the use of 370 watt panels for the Project,  
13        however, as articulated in section 3.3.1 of Greenskies's revised Petition, the technology  
14        of panels has improved so that Greenskies anticipates using 400 to 425 watt panels on the  
15        Project if the re-submitted Petition is approved. As a result, the number of panels has  
16        decreased from 55,692 panels (370 watts per panel) to 45,976 panels (400 to 425 watts  
17        per panel). This results in the original 20.16 MW DC (16.78 MW AC) being reduced to  
18        at least 18.4 MW DC (15.3 MW AC), depending on the type of panels that are selected.

19   **Q.    Is there anything you wish to add to your testimony?**

20   A.    The Project has spent over a year modifying its design, conducting additional testing, and  
21        reducing its footprint in direct response to the comments and input made by the Siting  
22        Council, the CT DEEP, the Town of Waterford and Save the Rivers/Save the Hills. The

Testimony of Jean-Paul La Marche

1 Project team believes that the Project being submitted to the Siting Council today is  
2 significantly different from the project that was submitted when this Petition was  
3 originally opened. Accordingly, we believe that this redesigned Project is ready for  
4 review by the Council.

5 **Q. Does this complete your testimony?**

6 **A.** Yes, it does.

7 [REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]  
8

Testimony of Jean-Paul La Marche

1 IN WITNESS WHEREOF, the undersigned has executed and delivered this testimony as of the  
2 date set forth above.

3  
4  
5 By: 

6 Name: Jean-Paul La Marche

7 Title: Project Development Director

8  
9 STATE OF CONNECTICUT )  
10 ) SS: HARTFORD  
11 COUNTY OF HARTFORD )  
12

13 On this 23rd day of January, 2020, before me, the undersigned, personally appeared Jean-Paul La  
14 March known to me (or satisfactorily proven) to be the person whose name is subscribed to the  
15 within Instrument and acknowledged that he executed the same as his free act and deed and the  
16 free act and deed of the limited liability company for the purposes therein contained.

17  
18 In Witness Whereof, I hereunto set my hand and official seal.

19  
20  
21 My commission expires:  
22 [SEAL]



Kurt D. Sheathelm  
Notary Public

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24  
ACTIVE/74725.48/LHOFFMAN/8608690v1

**KURT SHEATHELM**  
Notary Public, State of Connecticut  
My Commission Expires July 31, 2023